

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262
THIS DOCUMENT RELATES TO:	
MAYOR AND CITY COUNCIL OF BALTIMORE, et al., <div style="text-align: right;">Plaintiffs,</div> <div style="text-align: center;">v.</div> CREDIT SUISSE GROUP AG, et al., <div style="text-align: right;">Defendants.</div>	11-cv-5450 (NRB)
FTC Capital GmbH, et al., <div style="text-align: right;">Plaintiffs,</div> <div style="text-align: center;">v.</div> CREDIT SUISSE GROUP AG, et al. <div style="text-align: right;">Defendants.</div>	11-cv-2613 (NRB)

**NOTICE OF UNCONTESTED MOTION FOR ISSUANCE OF REQUEST FOR
INTERNATIONAL JUDICIAL ASSISTANCE, APPOINTMENT OF COMMISSIONER
AND DIRECTION OF SUBMISSION OF HAGUE CONVENTION APPLICATION**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Andrew J. Calica, dated July 28, 2016, and the exhibits annexed thereto (the “Calica Declaration”), the undersigned, attorneys for Defendant Société Générale (“SG”) in the above-captioned matters, move this Court, before the Honorable Naomi Reice Buchwald, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on such date and at such time as the Court may direct, for an Order:

- (1) Issuing a Request for International Judicial Assistance (“Request for Assistance”) pursuant to 28 U.S.C. § 1781 and Chapters I and II of the Hague Convention on

the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970, T.I.A.S. No 7444, 28 U.S.T. 2555 (the “Hague Convention”) in the form annexed as Exhibit B to the Calica Declaration;

- (2) Appointing Mr. Alexander Blumrosen as commissioner (“Commissioner”) pursuant to Article 17 of the Hague Convention, pending the approval of the French Ministère de la Justice, to (a) receive from SG its French-originated documents that are responsive to Plaintiffs’ Renewed First Coordinated Set of Requests for Production of Documents to Revived Defendants, Request No. 38, subject to (i) the parties’ agreement that the documents shall be those U.S. dollar LIBOR documents that SG previously produced to U.S. governmental authorities pursuant to their requests for production (the “Documents”), and (ii) a reservation of SG’s objections, (b) simultaneously transmit the Documents to counsel for Plaintiffs and SG pursuant to Article 17 of the Hague Convention and in performance of his appointment as Commissioner and duties thereunder, and (c) upon completion to inform the French Ministère de la Justice;
- (3) Directing submission of the Order and Request for Assistance to the French Ministère de la Justice, for the purpose of approving the appointment of the Commissioner;
- (4) Granting the additional relief set forth in the Order; and
- (5) Granting such other and further relief as this Court may deem just and proper.

A Proposed Order is annexed as Exhibit A to the Calica Declaration. As is reflected in the Calica Declaration, Plaintiffs do not oppose this motion.

Dated: New York, New York
July 28, 2016

/s/ Steven Wolowitz
Steven Wolowitz
Henninger S. Bullock
Andrew J. Calica
MAYER BROWN LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 506-2500
Fax: (212) 262-1910
swolowitz@mayerbrown.com
hbullock@mayerbrown.com
acalica@mayerbrown.com

Attorneys for Defendant Société Générale